

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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|---------------------------------|---|----------------------------------|
| |) | |
| CYRANO, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | CIVIL ACTION NO. 05-CV-11558-DPW |
| QUOTIUM TECHNOLOGIES, INC., |) | |
| QUOTIUM TECHNOLOGIES, S.A., and |) | |
| TECHNOLOGIES, S.A., |) | |
| |) | |
| Defendants. |) | |
| |) | |

LOCAL RULE 16.1(D) JOINT STATEMENT

The Plaintiff, Cyrano, Inc. ("Cyrano") and the Defendants, Quotium Technologies, Inc., Quotium Technologies, S.A., and Technologies, S.A. (collectively, "Quotium") have conferred in the above-captioned matter and hereby submit this Joint Statement pursuant to Local Rule 16.1(D), stating as follows:

I. Agenda Of Matters To Be Discussed At The Scheduling Conference

1. disposition of pending motion to dismiss in this matter;
2. disposition of pending motion to dismiss issues on appeal to First Circuit in Civil Action No. 02-11416-JLT;
3. effect of French judgments on the disposition of this matter; and
4. effect of anticipated determination by the United States Patent and Trademark Office on the disposition of this matter;
5. effect of anticipated final judgment in related matter; and
6. status of settlement discussions and alternative dispute resolution.

II. Trial By Magistrate Judge

The parties do not consent to trial by magistrate judge.

III. Proposed Pretrial Schedule, Including Plan For Discovery

After conferring, the parties have established the following pretrial schedule:

A. joint discovery plan

the parties have agreed to draft and submit a proposed confidentiality order twenty-one (21) days from the resolution of the pending motion to dismiss ("pending motion");

initial disclosures due thirty (30) days from the resolution of the pending motion;

pretrial conference thirty (30) days after the resolution of any summary judgment motion;

the parties, however, do not agree on the following

1. Cyrano proposes:

production of documents and interrogatories due March 30, 2006;

all depositions completed by June 30, 2006;

disclosure of expert testimony due August 30, 2006.

2. Quotium proposes:

all fact discovery due ten (10) months from the resolution of the pending motion;

disclosure of expert testimony due twelve (12) months from the resolution of the pending motion;

rebuttal expert testimony due fourteen (14) months from the resolution of the pending motion.

The parties agree that the final pretrial conference shall be thirty (30) days from the resolution of any summary judgment motion.

B. proposed schedule for filing motions

the parties shall have up until the first day of trial to move to join other parties and amend pleadings;

Quotium proposes that the deadline for filing all dispositive motions shall be sixteen (16) months from the date of the resolution of the pending motion; however, Cyrano proposes that the deadline for dispositive motions shall be fourteen (14) months.

IV. Miscellaneous

The pleadings docket and case caption will reflect the Plaintiff's new name - Vedant, Inc.

Respectfully submitted,
Plaintiff,
CYRANO, INC.
By its attorneys,

/s/ Stephen Y. Chow
PERKINS SMITH & COHEN LLP
One Beacon Street, 30th Floor
Boston, Massachusetts 02108
(617) 854-4000
Dated: October 27, 2005

Defendants,
QUOTIUM TECHNOLOGIES, INC., QUOTIUM TECHNOLOGIES, S.A., and TECHNOLOGIES, S.A.
By their attorneys,

/s/ Kevin J. O'Connor
Kevin J. O'Connor, BBO #555250
Mayeti Gametchu, BBO #647787
PARAGON LAW GROUP, LLP
184 High Street
Boston, MA 02110
(617) 399-7950
Dated: October 27, 2005

LOCAL RULE 16.1(D)(3) CERTIFICATIONS

The undersigned counsel and authorized representatives of the parties in this matter hereby affirm that each party and that party's counsel have conferred with a view to establishing a budget for the costs of conducting the full course, and various alternative courses, of the litigation, and have considered the resolution of the litigation through the use of alternative dispute resolution programs.

On behalf of the Plaintiff,

/s/Stephen Y. Chow
Stephen Y. Chow

/s/ Scott Almeda
Scott Almeda

On behalf of the Defendants

/s/Kevin J. O'Connor
Kevin J. O'Connor

/s/Michel Tiberini
Michel Tiberini